

Magistrate Judge Mary Alice Theiler

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN LITTLE,

Defendant.

NO. MJ16-352

COMPLAINT for VIOLATION

18 U.S.C. §§ 2252(a)(2)

BEFORE, the Honorable Mary Alice Theiler, United States Magistrate Judge,  
U. S. Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

**COUNT 1**

**(Receipt of Child Pornography)**

In or about March 2016, at Oak Harbor, within the Western District of Washington, and elsewhere, JOHN LITTLE did knowingly receive, and attempt to receive, visual depictions the production of which involved the use of minors engaging in sexually explicit conduct, and the visual depictions were of such conduct, using any means and facility of interstate and foreign commerce and which images had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

1 All in violation of Title 18, United States Code, Section 2252(a)(2), (b)(1).

2 And the Complainant states that this Complaint is based on the following  
3 information:

4 I, Gregory Leiman, being first duly sworn on oath, depose and say:

5 **I. INTRODUCTION**

6 1. I am a Special Agent (SA) with the Federal Bureau of Investigation  
7 assigned to the Everett, Washington Resident Agency, Seattle, Washington field office. I  
8 am an investigative and law enforcement officer of the United States within the meaning  
9 of Title 18, United States Code, Section 2510(7). My duties as a Special Agent include  
10 the full time investigation of a wide range of federal criminal offenses, including  
11 investigations involving child exploitation violations pertaining to the illegal production,  
12 distribution, receipt, and possession of child pornography and material involving the  
13 sexual exploitation of minors in violation of 18 U.S.C. §§ 2251, 2252(a), and 2252A(a).  
14 I have participated in the execution of previous search warrants which involved child  
15 exploitation and/or child pornography offenses and the search and seizure of computers  
16 and other digital devices. I have also had the opportunity to review examples of child  
17 pornography as defined by 18 U.S.C. § 2256.

18 2. As detailed below, based on my investigation and the investigation of other  
19 law enforcement officers, I submit there is probable cause to believe that JOHN LITTLE  
20 has committed the violations described above. In particular, the investigation has  
21 uncovered substantial evidence that in March 2016, JOHN LITTLE received and  
22 attempted to receive child pornography.

23 3. The facts set forth in this Complaint are based on my own personal  
24 knowledge; knowledge obtained from other individuals during my participation in this  
25 investigation, including other law enforcement officers; interviews of cooperating  
26 witnesses; review of documents and records related to this investigation; communications  
27 with others who have personal knowledge of the events and circumstances described  
28 herein; and information gained through my training and experience.

1           4.     Because this Complaint is submitted for the limited purpose of establishing  
2 probable cause, it does not set forth each and every fact that I or others have learned  
3 during the course of this investigation. I have set forth only the facts that I believe are  
4 relevant to the determination of probable cause to believe that JOHN LITTLE committed  
5 the offense charged in this Complaint.

## 6                                   II.     PROBABLE CAUSE

7           5.     On or about March 16, 2016, a father, hereinafter F1, and his thirteen-year-  
8 old daughter, hereinafter M.V., advised the Santa Fe County Sheriff's Office, hereinafter  
9 SFC SO, that in March 2016, M.V. had been self-producing child pornography and  
10 sending it to numerous individuals on the internet. M.V., using the KIK account  
11 "XXXXXXXXXXcute," communicated with a variety of individuals via the KIK  
12 messenger application. KIK messenger is an application available for download on  
13 mobile devices such as smartphones and tablets. The application allows individuals to  
14 establish user accounts and then exchange messages and files (such as photos and videos)  
15 over the Internet. KIK allows users to contact other users individually, as well as to post  
16 messages in public forums, chat in groups, and exchange messages and files with other  
17 KIK users.

18          6.     During a forensic interview of M.V., M.V. acknowledged that she  
19 communicated on KIK with a man who identified himself as John and had a username of  
20 "hawks1709." M.V. told the forensic interviewer that John knew she was thirteen years  
21 old. M.V. also acknowledged having sexually explicit conversations with John, sending  
22 sexually explicit photos and videos of herself to John, and receiving digital files from  
23 John, to include several photos of his penis and face, and one video in which John is seen  
24 blowing a kiss. M.V.'s claims were verified with forensic computer analysis, described  
25 in greater detail below.

26          7.     SFC SO obtained permission from F1 and M.V. to search M.V.'s iPhone.  
27 On or about March 30, 2016, SFC SO Detective Josh David used forensic computer  
28 software to analyze KIK Messenger chats between M.V. and an unknown KIK username,

1 many of which occurred between March 6, 2016, and March 13, 2016. Detective David  
2 noted numerous sexually explicit messages, including pictures and videos M.V. sent to  
3 the unidentified KIK user. These images and videos depicted M.V. showing her breasts  
4 and vagina to the unidentified KIK user. Some of the videos depicted M.V. masturbating  
5 and inserting foreign objects into her vagina. Detective David also used additional  
6 forensic software to identify an image M.V. received on March 10, 2016, at  
7 approximately 5:33:06 PM. This image depicts a facial picture of a mustachioed  
8 Caucasian male, approximately fifty to fifty-five years old, wearing a Seattle Mariners  
9 baseball hat and sitting in a brown chair. Based on further investigation described below,  
10 I obtained driver's license information from the Washington Department of Licensing  
11 and confirmed that the individual in this photograph is JOHN CHARLES LITTLE.  
12 Detective David determined that the male in the aforementioned image was the same  
13 individual in another KIK image file named orig\_hawks1709\_r9e@talk.kik.kikcom.  
14 Detective David then navigated to the KIK Messenger section of the forensic program  
15 used to analyze M.V.'s iPhone and identified a recovered KIK username of "hawks1709"  
16 with a KIK ID of "hawks1709\_r9e@talk.kik.com" and a display name of "JOHN #."  
17 Detective David was then able to determine the unknown username chat thread  
18 referenced above was in fact that of KIK username "hawks1709."

19 8. Pursuant to a Search Warrant executed on KIK for username "hawks1709,"  
20 Detective David received and reviewed IP logs, and identified the following IP address:  
21 76.28.242.19. This IP address was consistently used during the times and dates listed  
22 above while M.V. was chatting with and sending child pornography to the previously  
23 unidentified KIK user. Detective David used an open-source IP registry to trace the IP  
24 address 76.28.242.19 to Comcast, an internet service provider. On April 11, 2016,  
25 Comcast responded to a search warrant issued on the aforementioned IP address and  
26 confirmed that between March 9 and March 14, 2016, this IP address was used by  
27 Comcast subscriber John Little, service address 1121 SW Kaleeton Loop, Apt. 2, Oak  
28

1 Harbor, Washington 98277-4583, telephone number 360-XXX-XXXX, e-mail user IDs  
2 JohnLittle2984@comcast.net, and hawks1709@comcast.net.

3 9. The following are excerpts from the chat exchanges described above that  
4 took place in March 2016 between M.V. and "hawks1709" and do not include the entire  
5 transcript. The chat logs contain some messages in the transcripts that do not contain any  
6 material except for a notation of an attached file. Based on my knowledge, training, and  
7 experience, "blank" messages often indicate that a file was transferred (a picture or video  
8 file for example). It is likely that the messages identified as "blank messages" contained  
9 picture or video files that were sent from the KIK user. Moreover, the participants in the  
10 chat conversations frequently allude to pictures and videos that were exchanged at the  
11 time the chats occurred. It should be further noted that M.V. deleted her chat  
12 conversations, which were later recovered with the aid of computer forensic software; as  
13 such, only the content of the conversations was recovered, and not the username that  
14 normally precedes each message entry. The identity of each sender may be reasonably  
15 inferred based on the overall context of the chat session, and on information M.V.  
16 disclosed during a forensic interview.

17 10. In addition, to M.V.'s own statements, the messages and images exchanged  
18 between "hawks1709" and M.V. further suggest that "hawks1709" was aware that M.V.  
19 was a minor. For example, during their discussions, M.V. discussed the fact that she was  
20 in school. She also stated that her parents maintained separate homes and that she spent  
21 time living with each. M.V. also stated that her mother planned to take her to work with  
22 her. Each of these suggests that M.V. was not an adult.

23 11. In addition, I saw the following two exchanges between M.V. and  
24 "hawks1709" that further underscore M.V.'s youth:

25 **March 6, 2016**

26 SENDER: You still talking to all the other guys

27 SENDER: I don't have that many anymore

28 SENDER: What happened?

1 SENDER: Idk, I'm too young most of them said

2 **March 11, 2016**

3 SENDER: You leaving now?

4 SENDER: No I'm busy on here

5 SENDER: Doing what?

6 SENDER: Talking

7 SENDER: To who

8 SENDER: New guys from my post

9 SENDER: You getting naughty

10 SENDER: No I'm looking for BF

11 SENDER: Ok so taking applications lol

12 SENDER: Yup

13 SENDER: Good luck baby girl

14 SENDER: So many people can't read

15 SENDER: I put 13-15 and 23 yr old messages get me

16 SENDER: I know right

17 SENDER: It's stupid

18 SENDER: I have one application left

19 12. As noted above, "hawks1709" received several pictures and videos from  
20 M.V. Based on my review of the photos and videos M.V. sent to "hawks1709,"  
21 particularly photos in which M.V.'s face is visible, I would estimate that the person  
22 depicted is between thirteen and fifteen years old.

23 13. Among the images and videos sent to "hawks1709" were images and  
24 videos of a sexual nature, some of which were sent at "hawks1709's" behest. Using  
25 forensic software, Detective David was able to locate photographs and videos on M.V.'s  
26 iPhone that correspond to particular chat sessions, and provided copies of these files to  
27 me. I have reviewed that material and provide the following examples of exchanges  
28

1 between the two. (NOTE: Descriptions of these photographs and videos are interspersed  
2 with the chat transcript below.):

3 **March 8, 2016**

4 SENDER: He making you naughty things?

5 SENDER: No

6 SENDER: My daddy is though.

7 SENDER: What is he making you do

8 SENDER: Making me rub my pussy through my undies so he can get a wet  
9 spot

10 SENDER: Nice. Is it wet yet?

11 SENDER: Almost

12 SENDER: Mmmmm

13 SENDER: U horny?

14 SENDER: A little bit but at work

15 SENDER: Oh yea

16 SENDER: I wish I wasn't

17 SENDER: I'm wet

18 SENDER: Tease lol

19 SENDER: [BLANK MESSAGE WITH ATTACHMENT; one image depicting  
20 what appears to be M.V. in a pair of panties with a wet spot]

21 SENDER: .

22 SENDER: [BLANK MESSAGE WITH ATTACHMENT: one image depicting  
23 what appears to be M.V.'s exposed vagina]

24 SENDER: Mmmmm

25 SENDER: U want it bad don't u

26 SENDER: Yes

27 SENDER: R u hard

28 SENDER: No, would be awkward at work



1 SENDER: True

2 SENDER: Puts a smile on my face though

3 SENDER: Awe

4 SENDER: [BLANK MESSAGE WITH ATTACHMENT; one image of  
5 M.V.'s exposed breasts and vagina]

6 SENDER: Bigger smile

7 SENDER: Mmm

8 SENDER: [BLANK MESSAGE WITH ATTACHMENT; one video depicting  
9 M.V. inserting fingers into her vagina]

10 SENDER: Biggest smile?

11 SENDER: Yep

12 SENDER: You're such a naughty little slut

13 **March 9, 2016**

14 SENDER: You ever tried anything besides your brush

15 SENDER: Yeah yesterday for my boyfriend and put a multicolored pen cap in  
16 me it was as big as the brush handle

17 SENDER: Let me forward you a pic of it

18 SENDER: K

19 SENDER: [BLANK MESSAGE WITH ATTACHMENT; one photograph of a  
20 pink pen and pen cap]

21 SENDER: It's at my dad's house

22 SENDER: Did you like it

23 SENDER: Yea

24 SENDER: Look around your moms house

25 SENDER: [BLANK MESSAGE WITH ATTACHMENT; one video depicting  
26 M.V. inserting pen into her vagina]

27 SENDER: That's from yesterday

28 SENDER: Found something



1 SENDER: [BLANK MESSAGE WITH ATTACHMENT; one video of an  
2 unknown pink object]

3 SENDER: Supposed to be just a pic

4 SENDER: How big is it

5 SENDER: [BLANK MESSAGE WITH ATTACHMENT; one photograph of  
6 M.V. holding fingers, presumably to indicate the size of the above mentioned  
7 object]

8 SENDER: Look around for bigger

9 SENDER: K

10 SENDER: Maybe she has a toy hidden

11 SENDER: No we r Christians

12 SENDER: Ok

13 SENDER: Found something

14 SENDER: [BLANK MESSAGE WITH ATTACHMENT; one photograph of  
15 M.V. holding a baby bottle]

16 SENDER: Mmmm

17 SENDER: Which way in first

18 SENDER: Big end

19 SENDER: K

20 SENDER: I can't get it in

21 SENDER: Are you wet

22 SENDER: Yea

23 SENDER: This is as far in as it gets

24 SENDER: [BLANK MESSAGE WITH ATTACHMENT; one photograph of  
25 M.V. inserting the bottle into her vagina]

26 SENDER: Play and make yourself wetter

27 SENDER: I am wet

28 SENDER: Keep playing

1 SENDER: It's too big

2 SENDER: Does it feel good

3 SENDER: No it hurts

4 **March 11, 2016**

5 SENDER: I'm naked

6 SENDER: Mmmmm

7 SENDER: [BLANK MESSAGE WITH ATTACHMENT; one image depicting  
8 M.V.'s breasts and vagina]

9 SENDER: Sexy as hell

10 SENDER: Mmm thx

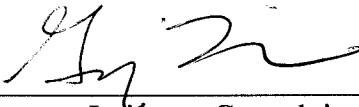
11 SENDER: .

12 SENDER: [BLANK MESSAGE WITH ATTACHMENT; one video depicting  
13 M.V. rubbing her vagina]

14 SENDER: Rub that clit

15 14. On July 27, 2016, I obtained a federal search warrant for JOHN LITTLE's  
16 residence and person, which was executed on August 4, 2016. During the execution of  
17 this search warrant, JOHN LITTLE was advised of his *Miranda* rights and agreed to  
18 waive those rights and be interviewed. Among other things, LITTLE confirmed that the  
19 username "hawks1709" was the profile name he used for online dating. When asked if  
20 he used that particular username on KIK, he stated that was also likely his username.  
21 LITTLE confirmed that he had used KIK and that he had had sexually explicit  
22 conversations with individuals he knew or had reason to know were minors. Although  
23 LITTLE did not specifically recall any conversations with M.V., when confronted with  
24 sample exchanges between the two, LITTLE characterized the conversations as  
25 consistent with those he would have when using KIK.

1        15. Based on the above facts, I respectfully submit that there is probable cause  
2 to believe that JOHN LITTLE did knowingly and intentionally receive child pornography  
3 in violation of Title 18, United States Code, Sections 2252(a)(2).  
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7 \_\_\_\_\_  
8 Gregory Leiman, Complainant  
9 Special Agent, Federal Bureau of Investigation  
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11        Based on the Complaint and Affidavit sworn to before me, and subscribed in my  
12 presence, the Court hereby finds that there is probable cause to believe the Defendant  
13 committed the offense set forth in the Complaint.  
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15        Dated this 5 day of August, 2016.  
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18 \_\_\_\_\_  
19 MARY ALICE THEILER  
20 United States Magistrate Judge  
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